



TELECOMMUNICATIONS
INDUSTRY ASSOCIATION

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January 19, 2017

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth St., S.W.
Washington, D.C. 20554

Re: *Ex Parte Notice – Access to Telecommunications Equipment and Services by Persons with Disabilities; Petition for Rulemaking Filed by the Telecommunications Industry Association Regarding Hearing Aid Compatibility Volume Control Requirements; Amendment to the Commission’s Rules Governing Hearing Aid-Compatible Mobile Handsets; Comments Sought on 2010 Review of Hearing Aid Compatibility Regulations, CG Docket Nos. 12-32 and 13-46; WT Docket Nos. 07-250 and 10-254*

James Reid, Senior Vice President – Government Affairs, Telecommunications Industry Association (“TIA”), together with outside counsel, Rachel Wolkowitz of Wilkinson Barker Knauer, LLP (“WBK”) met with the following staff of the Federal Communications Commission: Karen Peltz Strauss, Suzy Rosen Singleton, Robert Aldrich, and Susan Bahr of the Consumer and Governmental Affairs Bureau on January 17, 2017. Also in attendance were Thomas Goode of Alliance for Telecommunications Industry Solutions; Stephen Berger of ANSI ASC C63[®] Subcommittee 8 and consultant to Hearing Industries Association (“HIA”); James Bress of AST Technology Labs Inc. and TIA TR-41.3; and Steve Whitesell of Whitesell Consulting LLC (all by phone); Laura Stefani of Fletcher, Heald & Hildreth, representing HIA; and William Maher of Wilkinson Barker Knauer representing CTIA and the Consumer Technology Association.

During the meeting, Commission staff and the meeting participants discussed a number of issues posed in the pending Notice of Proposed Rulemaking (“*Notice*”) in the above-captioned proceeding.¹ TIA’s representatives advocated TIA’s positions on those issues, consistent with TIA’s comments on the *Notice*.²

¹ *Access to Telecommunications Equipment and Services by Persons with Disabilities; Petition for Rulemaking Filed by the Telecommunications Industry Association Regarding Hearing Aid Compatibility Volume Control Requirements; Amendment to the Commission’s Rules Governing Hearing Aid-Compatible Mobile Handsets; Comments Sought on 2010 Review of Hearing Aid Compatibility Regulations*, Notice of Proposed Rulemaking, 30 FCC Rcd 12219 (2015).

² Comments of the Telecommunications Industry Association (“TIA”), CG Docket Nos. 12-32, 13-46; WT Docket Nos. 07-250, 10-254 (filed Feb. 26, 2016) (“TIA Comments”); Reply Comments of



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In particular, TIA reiterated that the record does not demonstrate a need for a hearing aid compatibility (“HAC”) standard to address volume control for wireless handsets.³ TIA’s representatives also noted the inherent contradiction in mandating that industry prepare a standard without both an identified need and an identified performance metric that a standard could accomplish. In any event, TIA emphasized that it would be inappropriate to apply the existing HAC volume control standard, developed within TIA, to wireless phones.⁴ Finally, TIA questioned how the FCC would insert its designees into the established standards-setting process.⁵

Pursuant to the Commission’s rules,⁶ this letter is being electronically filed via ECFS and a copy of this submission is being provided to the meeting attendees from the Commission. Please let the undersigned know if you have any questions regarding this filing.

Respectfully submitted,

Telecommunications Industry Association

By: /s/ James Reid

James Reid

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cc: Karen Peltz Strauss
Suzy Rosen Singleton
Robert Aldrich
Susan Bahr

TIA, CG Docket Nos. 12-32, 13-46; WT Docket Nos. 07-250, 10-254 (filed Mar. 28, 2016) (“TIA Reply Comments”).

³ See, e.g., TIA Reply Comments at 4-5 (observing that survey data submitted by the Wireless RERC showed that a majority of respondents “had at least an ‘about average’ experience with their volume control,” including half “indicating they were ‘satisfied’ or very satisfied”).

⁴ See TIA Comments 10-12 (noting that, among other things, the “conversational gain standard was developed specifically for digital and analog wireline handset terminals and does not include test procedures applicable to CMRS wireless handsets”).

⁵ See TIA Comments 14; TIA Reply Comments at 3-4.

⁶ 47 C.F.R. § 1.1206.